

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Document Page 1 of 7



Order Filed on November 24, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Case No.:

Adv. No.:

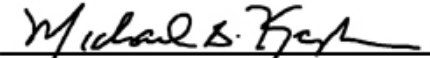
Hearing Date:

Judge:

**STIPULATION AND AGREED ORDER AUTHORIZING THE
OFFICIAL COMMITTEE OF TALC CLAIMANTS TO INTERVENE IN
PRELIMINARY INJUNCTION ADVERSARY**

The relief set forth on the following page is hereby **ORDERED**.

DATED: November 24, 2021


Honorable Michael B. Kaplan
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Matthew I.W. Baker, Esq. dstolz@genovaburns.com dclarke@genovaburns.com mbaker@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p>BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael Winograd, Esq. Jeffrey L. Jonas, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com jjonas@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Sunni P. Beville, Esq. sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
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<p>In Re:</p> <p>LTL MANAGEMENT, LLC,</p> <p style="text-align: right;">Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 21-30589(MBK)</p> <p>Honorable Michael B. Kaplan</p>
<p>LTL MANAGEMENT, LLC,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,</p> <p>Defendants.</p>	<p>Adv. Pro. No.: 21-03032 (MBK)</p>

**STIPULATION AND AGREED ORDER AUTHORIZING
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO
INTERVENE IN PRELIMINARY INJUNCTION ADVERSARY PROCEEDING**

The relief set forth on the following pages is hereby **ORDERED**.

WHEREAS, the above-captioned bankruptcy case (the “Chapter 11 Case”) was filed in the United States Bankruptcy Court for the Western District of North Carolina (the “WDNC Bankruptcy Court”) on October 14, 2021 (the “Petition Date”) [Case No.: 21-30589; D.I. 1]; and

WHEREAS, on October 21, 2021, the above-captioned debtor (the “Debtor”) commenced this Adversary Proceeding by filing a complaint (the “Complaint”) seeking (i) a declaratory judgment that the automatic stay applies to the assertion and prosecution of talc claims against the Debtor, its parent and non-debtor affiliates, identified retailers, insurance companies, and certain others parties and (ii) a preliminary injunction and temporary restraining order enjoining such actions; and

WHEREAS, on November 8, 2021, the WDNC Bankruptcy Court entered an order appointing the Official Committee of Talc Claimants (the “Committee”) pursuant to Section 1102(a)(1) of the Bankruptcy Code, upon the motion of the United States Bankruptcy Administrator for the Western District of North Carolina (the “Bankruptcy Administrator”). *See Order Appointing the Official Committee of Talc Claimants* [Case No.: 21-30589; D.I. 355]; and

WHEREAS, on November 15, 2021, the WDNC Bankruptcy Court entered an *Order Granting the Debtor’s Request for Preliminary Injunctive Relief* [D.I. 102] in the Adversary Proceeding; and

WHEREAS, on November 16, 2021, the WDNC Bankruptcy Court entered an order transferring the Chapter 11 Case, including this Adversary Proceeding, to the District of New Jersey [Case No.: 21-30589; D.I. 416]; and it is

NOW, THEREFORE, stipulated and agreed by and between the Debtor and the Committee and **ORDERED** as follows:

1. The foregoing recitals are incorporated by reference and made a part hereof.

2. The Committee is authorized to intervene and shall be deemed to so intervene in this Adversary Proceeding pursuant to Federal Rule of Civil Procedure 24 and Bankruptcy Rule 7024 as of the entry of this Order.

3. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

[Signatures on following page.]

The Debtor and the Committee agree and consent to the foregoing stipulation.

By: /s/ Daniel M. Stolz

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